

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
	)	
v.	)	CRIMINAL NO. 05-30030-MAP
	)	
	)	
MICHAEL CECCHETELLI,	)	
and	)	
CHARLES HOWARD,	)	
Defendants.	)	

THE GOVERNMENT'S MOTION TO CONTINUE THE STATUS CONFERENCE  
(Assented to)

The United States of America, by Michael J. Sullivan, United States Attorney for the District of Massachusetts, respectfully requests this Court to continue the final status conference in the above-captioned matter from January 6, 2006 to a date after January 20, 2006.

In support of this motion, the Government states the following:

1. The undersigned assistant U.S. Attorney's competing caseload has delayed the government's response to the Court's discovery order. Although the government has substantially complied with the Court's December 1, 2005 findings concerning disputed discovery, the undersigned assistant U.S. Attorney's competing caseload has prevented the government from finishing its review of all the potentially discoverable information.

2. The undersigned assistant U.S. Attorney believes that the outstanding discoverable information will be forwarded to the parties by January 6, 2006.
3. Attorney Thompson, Counsel for Defendant Cecchetelli, has requested at least two weeks to review the discovery. Attorney Thompson has assented to this motion to continue the final status conference.
4. Attorney Albano could not be reached at the time this motion was filed.

Filed this 4th day of January 2006.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By: /s/ Paul Hart Smyth

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Paul Hart Smyth  
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

Hampden, ss.

Springfield,  
Massachusetts  
January 4, 2006

I, Paul Hart Smyth, Assistant U.S. Attorney, do hereby certify that I have served a copy of the foregoing to Attorney Linda Thompson, at 1331 Main Street, Springfield, MA, and to Attorney Albano, at 73 State Street, Springfield, MA.

/s/ Paul Hart Smyth  
Paul Hart Smyth  
Assistant U.S. Attorney